UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 29, 2002

Chuck McLaughlin
de maximis, inc.
5225 Canyon Crest Drive
Building 200 / Suite 253
Riverside, CA 92507

RE: Sampling and Analysis Plan Addendum for Additional Data Collection in the Phase 1a Area, May 31, 2002
Omega Chemical Superfund Site

Dear Chuck:

USEPA has reviewed CDM's report entitled "Sampling and Analysis Plan Addendum for Additional Data Collection in the Phase 1a Area" dated May 31, 2002. Thank you for your submittal of this report. Below are our comments on this document.

1. ***Section 1.2, Background, Page 1-2, 2nd bullet:*** Please identify the "new Putnam Street well location" (OW-8).

2. ***Section 1.3.4, Well Development Data:*** Well OW-7 is described as incapable of sustaining pumping rates exceeding 1 gpm. However, OW-7 is also listed with wells OW-4a and OW-4b as producing in excess of 5 gpm. Please clarify the identification of the third well subject to test pumping (OW-8?).

   Secondly, the development log for OW-7 shows an average pumping rate during development of 2 gpm, which is greater the stated maximum of 1 gpm.

   Well OW-4b is listed as a possible candidate for pump testing in this subsection, yet OW-2 and OW-3 are not. This does not correspond to the summary in Section 1.2 or list of wells to be pump tested described in Section 2.1. Please clarify, reconcile, or omit, as appropriate.

3. ***Section 2, General:*** A Sample Collection Summary Table equivalent to Table 2-1 in the Downgradient Well SAP should be provided that lists number of samples for each analyte, with QA/QC samples (e.g., duplicates, blanks) also identified.

4. ***Section 2, Field Sampling Procedures:*** A SOP for basic aquifer testing procedures and parameter calculations should be included in an appendix to the SAP Addendum, if available.

5. ***Section 2.1.1, Paragraph 4:*** More information should be provided about the types of data loggers and transducers to be used during aquifer testing. A description of operation and/or calibration procedures should be provided here or in an Appendix. In addition, decontamination procedures should be described, or the Downgradient Well SAP should be referenced.

6. ***Section 2.1.1, Paragraph 5:*** The method to be used to analyze aquifer testing data to provide estimates of hydraulic conductivity should be described or referenced.

7. ***Section 2.1.2, Water Quality Sampling and Analysis:*** EPA recommends the collection of one sequential duplicate field sample per the four wells sampled in connection with the aquifer testing.

   EPA also recommends adding detail indicating that discharge rate will be slowed to less than 1 gpm for sample collection.

8. ***Section 2.2, Paragraph 1:*** An explanation is not given regarding why monitoring well sampling is now being performed on a semi-annual basis rather than quarterly, as described in Section 1. A good baseline has not been established which explains quarterly fluctuations. For example, Well OW4A had 1300 ug/l of PCE on 8/16/2001, 9.8 ug/l on 11/16/2001, and 130 ug/l on 2/15/2002. Also, it is interesting to note that the average rainfall in Los Angeles for the last 125 years is 14.95 inches. The rainfall recorded at the downtown Los Angeles weather station for 2001-2002 was the lowest ever recorded at 4.42 inches. The rainfall for 2000-01 was 17.94 inches. Therefore, with this variation in rainfall and variation on well data, EPA still contends that CDM should conduct quarterly sampling of OU1 wells.

9. ***Sections 2.1.2 and 2.2, General:*** Sample collection and handling procedures specific to Nitrate/Nitrite, Dissolved Organic Carbon, Methane/Ethane/Ethene, Hexavalent Chromium, 1,4-Dioxane, and Perchlorate, are not provided here or in the Downgradient Well SAP. Therefore, EPA requests these be added.

10. ***Section 2.2, Paragraph 2:*** EPA requests that an SOP or instruction manual for the Hach Test Kit be provided.

11. ***Section 2.2, <u>Natural Attenuation Analytical Parameters (fixed base laboratory):</u>*** Please discuss criticality of reducing/anaerobic conditions to decision for conducting methane/ethane/ethane analysis.

12. ***Section 2.2, <u>Emerging Compounds (fixed base laboratory):</u>*** Please indicate level and percentage of data validation for both emerging compounds and natural attenuation parameters, as well as for VOCs.

13. ***Section 3, General:*** Quality Control requirements (reporting/quantitation limits, precision, accuracy, etc.) and/or laboratory SOPs should be provided for methods not discussed in the Downgradient Well SAP. This includes Nitrate/Nitrite, Dissolved Organic Carbon, Methane/Ethane/Ethene, Hexavalent Chromium, 1,4-Dioxane, and Perchlorate. In addition, a discussion of data validation procedures should be included or referenced.

If you have any questions regarding these comments, please contact me at (415) 972-3251.

Sincerely,

Nancy Riveland-Har

Nancy Riveland-Har
EPA Project Manager

cc. C. Yuge, Weston
L. Parnass, DTSC